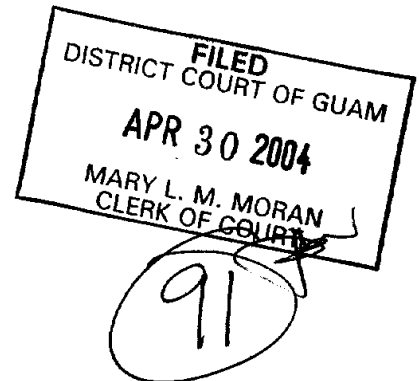


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DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**NOTICE OF MOTION TO STRIKE
THE FIRST AMENDED COMPLAINT
IN WHOLE OR IN PART, OR, IN THE
ALTERNATIVE, MOTION TO
DISMISS THE THIRD AND SIXTH
CAUSES OF ACTION AND
SANCTIONS**

**TO: PLAINTIFFS AND THEIR ATTORNEYS OF RECORD, ARRIOLA, COWAN
AND ARRIOLA**

NOTICE IS HEREBY GIVEN that on the 28th day of May, 2004, at the hour of 3:00 p.m. or as soon thereafter as the matter can be heard at the District Court of Guam, Defendant Hongkong Shanghai Banking Corporation, Ltd. will move this Court for an Order to Strike Plaintiffs' First Amended Complaint or, in the alternative, Dismiss the Third and Sixth Causes of Action and Sanctions in this matter.

The Motion will be based upon this Notice of Motion and the Memorandum of Points and Authorities concurrently filed herein and the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

EXECUTED on this 30th day of April 2004.

**LAW OFFICES OF BRONZE & TANG
A Professional Corporation**

By: _____


JACQUES G. BRONZE

*Attorneys for Defendant Hongkong and
Shanghai Banking Corporation, Ltd.*